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March 29, 2019

**By ECF**

Hon. Michael A. Hammer, U.S.M.J.  
United States District Court  
for the District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**RE: *Industria de Alimentos Zenú S.A.S. v. Latinfood U.S. Corp. d/b/a Zenú Prods. Co., et al.,***  
**Civ. Action No. 2:16-cv-6576-KM-MAH**

Dear Judge Hammer:

We represent plaintiff/counter defendant Industria de Alimentos Zenú S.A.S. and third party defendant Cordialsa USA, Inc. ("Industria") in the above-captioned action and write jointly with defendants, Latinfood U.S. Corp. d/b/a Zenú Products Co. and Wilson Zuluaga, pursuant to the Court's March 21, 2019 Order, Dkt. No. 141, to update the Court on the status of the certain discovery disputes.

The parties met and conferred on March 28, 2019. The parties have agreed that Defendants will file any motion to quash Industria's subpoena to Network Solutions, LLC ("Network Solutions") on May 10, 2019, with Industria's opposition papers due May 20, 2019, Defendants' reply papers due May 28, 2019, and the motion day will be June 3, 2019.<sup>1</sup> The parties further agree to a fact discovery end date of July 15, 2019.

We thank the Court for its attention to this matter.

/s/  
Samuel Kadosh

SK:jv

cc: Mark J. Ingber, Esq.

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<sup>1</sup> Network Solutions was notified not to produce any documents pursuant to the subpoena until a court order, or further direction from the parties.